

1 Mark R. Thierman, Bar No. 8285
Joshua D. Buck, Bar No. 12187
2 Leah L. Jones, Bar No. 13161
THIERMAN BUCK LLP
3 7287 Lakeside Drive
Reno, Nevada 89511
4 Tel: (775) 284-1500
Fax: (775) 703-5027

5 *Attorneys for Plaintiff*

6 Rick Roskelley, Bar No. 3192
7 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway, Suite 300
8 Las Vegas, Nevada 89169
Tel: (702) 862-8800
9 Fax: (702) 862-8811

10 *Attorneys for Defendant*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 MICHELLE GALLAWAY, on behalf of
14 herself and all others similarly situated,

15 Plaintiff,

16 vs.

17 BARCLAYS BANK DELAWARE; and
18 DOES 1 through 50, inclusive,

19 Defendant.

Case No. 2:15-cv-02003-APG-GWF

**STIPULATION TO STAY ALL
PROCEEDINGS**

20 Plaintiff Michelle Gallaway ("Plaintiff"), by and through her counsel of record, and
21 Defendant Barclays Bank Delaware ("Defendant"), by and through its counsel of record, submit
22 the below stipulation to stay all proceedings in the above captioned matter. The purposes of this
23 stay is to allow the parties to engage in meaningful global settlement discussions that will fully
24 and finally resolve this dispute. The Parties therefore stipulate and agree that:

25 1. The above captioned dispute shall be stayed from November 4, 2015, until
26 February 15, 2016 (the "Stay Period");
27
28

3. If the Parties do not resolve this dispute during the Stay Period and do not request an additional stay from the Court to continue settlement negotiation, the Parties agree that the following schedule shall be implemented:

a. Plaintiffs shall file an amended complaint, if any, fourteen (14) calendar days after the end of the Stay Period;

7. The statute of limitations shall be tolled commencing on November 4, 2015, and ending on the last day of the Stay Period (or any additional stay period) such that measurement of the statute of limitations applicable to any claim asserted under the Fair Labor Standards Act shall exclude the Stay Period;

8. The Parties reserve all rights and defenses to which they are entitled as of the first day of the Stay Period and this stipulation does not effect and is not intended to effect a waiver of any such right or defense.

Dated this 5th day of November, 2015.

THIERMAN BUCK, LLP

LITTLER MENDELSON, P.C.

/s/ Joshua D. Buck
Mark R. Thierman, Bar # 8285
Joshua D. Buck, Bar #12187
Joshua D. Buck, Bar #12187
7287 Lakeside Drive
Reno, Nevada 8911

/s/ Rick Roskelley
Rick Roskelley, Bar No. 3192
3960 Howard Hughes Parkway, Suite 300
Las Vegas, Nevada 89169

Attorneys for Plaintiff

Attorneys for Defendant

ORDER

IT IS SO ORDERED _____ November 9, 2015.



GEORGE FOLEY, JR.
United States Magistrate Judge